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 AUTH. NAME AUTHUR AFFILIATION  
 ROOT, L.D. Iowa Electric Light & Power Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Application for proposed Amend RTS-144 to License DPR-44 providing "Plan for Integrated Scheduling of Plant Mods".

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*ADL*

Iowa Electric Light and Power Company

November 12, 1982  
NG-82-2309

LARRY D. ROOT  
ASSISTANT VICE PRESIDENT  
NUCLEAR GENERATION

Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

On May 28, 1982, Iowa Electric Light and Power Company (IELP) submitted an application for approval of an integrated program for modification of the Duane Arnold Energy Center (DAEC). As described in the program description document accompanying the application, the program was developed by IELP to assist in managing certain plant modifications which have either been required by the NRC or are perceived by the licensee as reasonably foreseeable requirements. The program integrates, in a computerized system, the engineering, procurement and installation of planned NRC retrofit requirements, as well as associated management and training requirements. It also encompasses IELP's anticipated requirements for plant modifications in the interest of efficiency and reliability as well as maintenance and fuel cycle schedules.

Our May 28, 1982 program has been studied by your Staff. They have provided extremely helpful suggestions which are particularly important in developing this innovative approach to managing regulatory retrofit and new NRC requirements. As a result of the interaction with your Staff, our submittal has been simplified and streamlined and is embodied in the enclosed proposed license amendment, RTS-144, which is hereby submitted for your approval in accordance with the requirements of 10CFR50.90.

This application, RTS-144, has been reviewed by the DAEC Operations Committee and the DAEC Safety Committee. This is a Class III Amendment and a check for \$4,000 is enclosed.

The draft amendment refers to a "Plan for the Integrated Scheduling of Plant Modifications for the Duane Arnold Energy Center" (the "Plan"). The Plan describes how the program functions, mechanisms for changing the Plan and updating it and the interactions of NRC and licensee staffs under the Plan.

Attached to the Plan are three schedules. Schedule A identifies existing NRC requirements. Schedule B contains items which appear likely at this time, to the licensee, to become NRC requirements. Both Schedules have

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Mr. Harold Denton  
November 12, 1982  
NG-82-2309  
Page Two

timelines which reflect completion dates over the five-year period of the Plan. Since schedular requirements for Schedule A items have been formally prescribed by the NRC, changes may not be made without prior NRC approval in accordance with established NRC procedures.

IELP may modify completion dates for Schedule B items as necessary, but will keep the NRC currently informed. NRC concurrence in Schedule B does not imply Commission acknowledgement that an item therein will, in fact, be established as a formal NRC regulatory requirement or that if so established the date for its completion may not be other than as set forth in Schedule B.

Schedule C is submitted for information only; however, it is an extremely important document because it shows the totality of major activities in the program description transmitted with our letter of May 28, 1982, encompassing not only items in Schedules A and B but also those activities planned by the licensee in order to improve plant efficiency and reliability. The impact of any change in Schedules A and B (whether imposed by the Staff or initiated by the Licensee) can only be understood in light of the information in Schedule C and the May 28, 1982 description.

As we have discussed with your staff, the basic objectives of the Plan are to:

- (1) enable IELP to manage more effectively its implementation of principal modifications to the DAEC;
- (2) provide the NRC with timely information concerning the progress and planning of principal modifications which interrelate with those required to satisfy NRC requirements; and,
- (3) facilitate the scheduling of new or modified regulatory requirements in a coordinated and realistic manner that takes into account the priorities of existing modification programs and the requirements for safe, reliable and efficient operation of the DAEC.

We believe that approval of this amendment will constitute a major step by the Commission in implementing the policy objective of assuring that new regulatory requirements are imposed in a reasonable and responsible manner. That objective was recently articulated by Chairman Palladino in a speech advocating that new requirements be incorporated into the schedules of affected plants on a "case-by-case basis" and that implementation requirements take "into account the competing priorities of all work that needs to be done at each plant."<sup>1</sup> We believe this amendment is consistent with the thrust of this policy initiative and request your earliest possible action.

Mr. Harold Denton  
November 12, 1982  
NG-82-2309  
Page Three

Finally, we wish to make clear that in approving this amendment the Commission's authority to impose new requirements necessary in the interests of the public health and safety remains unimpaired. It is intended, however, that if such new requirements affect IELP's ability to complete any other scheduled work items, these documents will form a basis for discussion of accommodating such requirements.

Pending approval of the amendment, we request your concurrence in the Plan which I believe that both we and the NRC Staff will find to be a useful mechanism for managing more effectively any new regulatory requirements and handling such matters as implementation of SECY 82-111, "Requirements for Emergency Response Capability." We would appreciate your interim advice endorsing and authorizing use of the Plan pending action on the proposed amendment.

Three signed and 37 additional copies of this application are transmitted. This application, considering of the foregoing letter and enclosures, is true and accurate to the best of my knowledge.

IOWA ELECTRIC LIGHT AND POWER COMPANY

BY Larry D. Root  
Larry D. Root

Subscribed and sworn to Before Me on  
this 12<sup>th</sup> day of November 1982.

Shellean M. Herber  
Notary Public in and for the State of Iowa

LDR/KM/dmh\*

cc: K. Meyer  
D. Arnold  
L. Liu  
S. Tuthill  
F. Apicella  
NRC Resident Office  
Ref: Commitment Control No. 82-0130

<sup>1</sup> "Meeting the Challenge for A Nuclear Future," Remarks by Nunzio J. Palladino at the INPO Conference of Chief Executive Officers, Atlanta, Georgia (Oct. 5, 1982).